

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**D.T.E. 01-31**

**Respondent:** Robert Mudge  
**Title:** President Verizon MA

**REQUEST:** Attorney General, Set #3

**DATED:** August 3, 2001

**ITEM:** AG-VZ 3-19 For each month beginning in January 2000 and through the most recent period for which data is available, please provide the following information:

- a. The number of residential subscribers who have changed service provider from Verizon MA to a CLEC.
- b. The number of residential subscribers who have changed service provider from Verizon MA to a CLEC who are contacted by Verizon MA in an effort to "win them back" to Verizon MA.
- c. The number of residential subscribers who have received some form of "win-back" contact who return to Verizon MA within 30 days of receiving such contact.
- d. The compensation that is paid to a Verizon MA representative for each successful "win-back" of a residential customer by that representative. Please specify whether the compensation received by individual representatives is in the form of money, other goods and services, or other in-kind compensation.
- e. The number of business subscribers who have changed their service providers from Verizon MA to a CLEC.
- f. The number of business subscribers who have changed their service providers from Verizon MA to a CLEC who are contacted by Verizon MA in an effort to "win them back" to Verizon MA.

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(cont'd)

- g. The number of business subscribers who have received some form of "win-back" contact who return to Verizon MA within 30 days of receiving such contact.
- h. The compensation that is paid to a Verizon MA representative for each successful "win-back" of a business customer by that representative. Please specify whether the compensation received by individual representatives is in the form of money, other goods and services, or other in-kind compensation.

**SUPPLEMENTAL  
REPLY:**

- a. Please see the attached.
- b-d. Verizon MA objects to these requests on the grounds that they are overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seek the disclosure of confidential and commercially sensitive material.
- e. Please see the attached.
- f-h. Verizon MA objects to these requests on the grounds that they are overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seek the disclosure of confidential and commercially sensitive material.

VZ # 95S

- a. The following data represents Verizon MA's residence customers who changed their service providers for the years 2000 and 2001.

	<u>2001</u>	<u>2000</u>
January	10,011	7,176
February	10,385	3,170
March	9,859	7,132
April	11,968	8,933
May	10,738	8,573
June	9,027	10,925
July		9,684
August		9,137
September		9,968
October		10,192
November		11,418
December		12,833

- e. The following data represents Verizon MA's business customers who changed their service providers for the years 2000 and 2001.

	<u>2001</u>	<u>2000</u>
January	11,486	6,687
February	12,857	7,666
March	10,877	8,864
April	11,213	10,056
May	10,377	11,157
June	10,723	10,866
July		12,560
August		10,898
September		14,515
October		11,200
November		12,518
December		12,205

